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11	UNITED STATES DISTRICT COURT	
12	DISTRICT OF NEVADA	
13	GREGORY M. THOMAS,)
14	Plaintiff,) Case No: 2:15-cv-00291-APG-NJK
15	v.)
16	UNITED STATES OF AMERICA,	
17	Defendant.	
18		
19	MOTION FOR EXTENSION OF TIME TO FILE DISPOSITIVE MOTIONS (First Request)	
20	(F	irst Request)
21	Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure and Rule 6-1 of this	
22	Court's Local Rules, the United States moves for an extension of thirty days, from February	
23	19, 2016 to March 21, 2016, to file dispositive motions. There has not been a previous request	
24	for an extension of such deadline, although there was a previous, more general extension of the	
25	discovery schedule and pretrial deadlines, see order (ECF No. 13).	

In support of this motion, the United States relies on the Memorandum of Points and Authorities below. Respectfully submitted this 28th day of January 2016. DANIEL G. BOGDEN **United States Attorney** /s/ Patrick A. Rose PATRICK A. ROSE Assistant United States Attorney

MEMORANDUM OF POINTS AND AUTHORITIES

Federal Rule of Civil Procedure 6(b)(1) and Local Rule 6-1 allow a party to request additional time to perform an act. In this case, the United States respectfully requests this extension for the reasons set forth below.

Undersigned defense counsel is currently preparing for a trial in the matter of *Kornberg v. United States of America*, 2:12-cv-01961-JAD-PAL. The *Kornberg* case was reassigned to undersigned defense counsel in connection with the departure of an AUSA at the end of November 2015. Trial dates are scheduled for February 2, 3 and 10, 2016. With the *Kornberg* trial and other duties, undersigned defense counsel will not have time to prepare dispositive motions in the instant *Thomas* case by the current deadline of February 19, 2016.

This motion is brought in good faith and not for purposes of undue delay or unfair prejudice to Plaintiff.

For the reasons above, the United States respectfully requests an extension of time, from February 19, 2016 to March 21, 2016, to file dispositive motions.

Respectfully submitted this 28th day of January 2016.

DANIEL G. BOGDEN United States Attorney

/s/ Patrick A. Rose
PATRICK A. ROSE
Assistant United States Attorney

IT IS SO ORDERED:

United States Magistrate Judge

DATED: January 29, 2016

PROOF OF SERVICE I, Patrick A. Rose, AUSA, certify that the following individuals were served with the MOTION FOR EXTENSION OF TIME TO FILE DISPOSITIVE MOTIONS on this date by the below identified method of service: **Electronic Case Filing:** Brian David Nettles briannettles@nettleslawfirm.com Christian Morris christian@nettleslawfirm.com Attorneys for Plaintiff. Dated this 28th day of January 2016. /s/ Patrick A. Rose PATRICK A. ROSE Assistant United States Attorney